

ALLTEL Communications, Inc.
E-911
Twentieth Quarterly Report
August 1, 2007
CC Docket No. 94-102

Introduction

Alltel Communications, Inc. ("Alltel") is a cellular and PCS provider subject to the Phase II deployment requirements for Tier II carriers as contained in the Commission's Order to Stay, CC Docket No. 94-102, 17 FCC Rcd 14841 (2002) ("Stay Order"). Alltel has chosen a CDMA-based AGPS handset-based location technology to comply with the Phase II E-911 requirements for its "home" subscriber base.

Alltel is also required to begin delivering Phase II enhanced service to PSAPs by the later of six months of a bona fide PSAP request or March 1, 2003. Alltel is implementing Phase I and Phase II service to PSAPs in accord with the activation timetables negotiated with the PSAPs and has an exemplary record both for the timeliness and quality of its Phase I and Phase II activations.

This report is submitted pursuant to ¶¶ 28-31 of the Stay Order, and in accordance with the procedures established by Public Notice, Wireless Telecommunications Bureau Standardizes Reporting on Wireless E-911 Implementation, DA 03-1902 (released June 6, 2003). The spreadsheet required under the Public Notice is attached hereto. This report is also submitted to meet the requirements of paragraphs 25 and 30 of the Commission's Order of January 5, 2007. See, *In the Matter of Alltel Corporation Petition for Limited Waiver of Location-Capable Handset Penetration Rule*, WT Docket No. 05-287, FCC 06-64 (Released January 5, 2007) (the "Waiver Order"). Alltel met the 95% AGPS-equipped handset deployment threshold as of May 31, 2007 and so certified to the Commission per the requirements of the Waiver Order.

Alltel has continued to actively engage the PSAPs within its market areas to ensure timely deployment of both Phase I and Phase II E-911 service in keeping with the status and readiness of the particular PSAP, the availability of vendor equipment and LEC upgrades, as well as the Commission's deadlines for Phase II E-911 under the Stay Order.

Discussion

I. Phase II AGPS Network Deployments

As previously reported, Alltel has completed switch upgrades, deployment and testing of redundant MPC/PDEs, and has implemented redundant trunking between these units. Alltel has configured its system consistent with the standard E-2 interface and has completed testing. As previously advised, further real-world testing of the MPC/PDE is necessary on a PSAP-by-PSAP basis to ensure end-to-end functionality. Alltel engages in

such testing with capable PSAPs prior to cutting to live service. Alltel previously reported that it had acquired a number of GSM/TDMA-based systems and deployed CDMA overlays in these markets in accordance with timetables established with Commission staff to facilitate Phase II compliance via Alltel's existing Phase II AGPS handset-based technology solution. Alltel has converted each of these markets to CDMA technology and has incorporated them into Alltel's company-wide A-GPS based handset solution. Alltel met each of the commitments made in its waiver and is on target for a timely deployment of Phase II in those markets where pending requests have been received.

II. Handset Deployment

Alltel, as noted above, met the 95% AGPS-equipped handset deployment threshold as of May 31, 2007 and so certified to the Commission per the requirements of the Waiver Order.

The following is a summary list of AGPS-enabled handsets currently distributed by Alltel and their launch dates:

Blackberry 7130e	6-Mar
Blackberry 7250	5-Apr
Kyocera KX12	6-Mar
Kyocera KX16	5-Dec
Candid	
Kyocera K612B	6-Jun
Strobe	
LG AX5000	5-Aug
LG AX390	6-Jul
LG AX355	6-Jul
LG AX490	6-Aug
Motorola E815	6-May
Motorola M800	6-Mar
Motorola RAZR V3c	5-Nov
Motorola V262	4-Dec
Motorola W315	6-Sep
Motorola K1m	6-Oct
Nokia 2865i	6-Sep
Palm Treo 650	5-Nov
Pantech PN218	6-Aug
Samsung A645	6-Aug
Samsung U420	6-Sep
UTStarcomm 6700	5-Nov
Blackberry RIM8703e	11/22/2006
LG AX380	8/2/2007
LG AX145	7/19/2007
LG AX275PK	4/19/2007
LG AX275SV	4/19/2007

LG AX490a	8/3/2006
LG AX8600 (blue)	3/22/2007
LG AX8600 (green)	3/22/2007
LG AX8600 (silver)	6/7/2007
Motorola RAZR V3a	6/21/2007
Motorola Q	3/29/2007
Palm Treo 700p	1/18/2007
Palm Treo 700wx	12/7/2006
The Alltel Hue (r500)	7/9/2007
The Alltel Snap (r340)	5/3/2007
The Wafer – r510	5/3/2007

III. Accuracy Requirements and Methodology

Alltel's extensive testing and evaluation processes were reported and detailed in its earlier Quarterly Reports. Alltel has transitioned from testing and evaluating its AGPS solution to real-world deployment of its technology in response to valid PSAP requests. Alltel has contracted with Vision One and Ericsson for calibration and functional testing for deployment to capable PSAPs. Alltel has separately contracted with TechnoCom to engage in accuracy testing. In all markets in which PSAPs have requested service, Alltel is capable of transmitting Phase II ALI to the PSAP for all of its MSC vendors – Lucent, Nortel and Motorola. As discussed below, additional testing is required as individual PSAPs complete their own upgrades and deployment proceeds on a PSAP by PSAP basis. Finally, Alltel continues to test new ALI-capable handsets prior to their acceptance into its product line to establish benchmarks for Phase II location accuracy.

IV. Deployment Issues

As previously reported, Alltel has encountered the same PSAP, vendor and LEC issues as well as the technology hurdles normally experienced with the initial deployment of a maturing technology. These issues have arisen in both the Phase I and Phase II contexts. Alltel's experience indicates that, in most markets, problems are resolved in a timely manner and subject to mutually agreed upon deployment schedules for Phase II so that service to the PSAPs is not adversely affected.

V. Status of Phase I and Phase II Deployment Efforts.

Alltel continues to strive for early E-911 deployment. Additional markets are moving rapidly toward live Phase II deployment. Detailed spreadsheets on both Phase I

and Phase II deployment schedules are attached to this filing. Alltel would be pleased to provide the Commission with such additional information as it may require.

A. Phase I

Alltel has received 1,783 Phase I PSAP requests as of July 31, 2007, of which 1,531 have been implemented. Alltel has approximately 105 PSAP requests for Phase I in progress with implementation scheduled for the agreed upon deployment date listed in the attached spreadsheets. Alltel has pending 147 requests for Phase I service that have been determined to be non-bona fide requests, although Alltel continues to cooperatively work with these PSAPs in order to schedule activation in accordance with the prospective time frame for the PSAPs readiness.

B. Phase II

To date, Alltel has received a total of 1,457 Phase II requests. Of this number, 1,153 requests have been met and service has been cut-live, while approximately 176 requests are in progress with deployment scheduled for the agreed upon dates listed on the attached spreadsheets. Alltel has received 128 non-bona fide requests, and Alltel continues to work cooperatively with these PSAPs in order to schedule activation in accordance with the prospective time frame for the PSAPs' readiness.

C. General Condition

As previously reported, technology issues for Alltel's multi-vendor network have largely been resolved and Alltel continues to work aggressively to resolve open issues on a PSAP-by-PSAP basis. Although some minor delays in Phase II service have occurred, Alltel has taken all the steps for deployment on its home subscriber serving networks that are not dependent on PSAP readiness. Alltel has completed all hardware and software upgrades necessary in its own network and completed testing; accounted for all trunking between its system to the selective router and the ALI database; and established and maintained contact with the PSAPs to obtain any necessary information. Order on Reconsideration, FCC 02-318, ¶ 21 (rel. Nov. 26, 2002), codified at 47 C.F.R. § 20.18(j)(4)(vi). As discussed above, however, full end-to-end testing requires PSAP participation. Also, as discussed in previous reports (incorporated herein by reference) further refinements are necessary during the final deployment stages, as each PSAP's network and equipment is different. Alltel continues to arrive at mutually agreed upon launch dates with its PSAPs. *See* 47 C.F.R. § 20.18(j)(5). Nevertheless, in some markets there is a chance that Alltel will encounter unforeseen delays in implementation and, consequently, may need to seek specific and limited relief from deployment deadlines. Alltel's good faith efforts warrant Commission flexibility as Alltel works through the PSAP-specific issues that will arise during final end-to-end testing with PSAPs.¹

¹ As the Commission has acknowledged, an additional period of time is required between the time the PSAP becomes E-911 capable and the date of service launch. *See* 47 C.F.R. § 20.18(j)(4)(x) (affording certifying carriers 90 days to provide E911 service after the PSAP becomes capable).

Alltel would be pleased to provide the Commission with such additional information as the Commission may require.

Declaration

I have read the foregoing E-911 Twentieth Quarterly Report of Alltel Communications, Inc. and declare under penalty of perjury that it is true and correct to the best of my information and belief. Executed August 1, 2007.

/s/
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CERTIFICATE OF SERVICE

I, Glenn S. Rabin, hereby certify that on the 1st day of August, 2007, I caused copies of the foregoing "Twentieth Quarterly Report" to be sent to the following by first class mail, postage pre-paid, to the following:

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